REMARKS

Status of the Claims

All claims 1-26 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,690,391 (Proehl). Independent claims 1, 14, and 23 are amended herein. Support for the amendments can be found in the specification at, for example, page 39 (see, especially, the middle paragraph on that page). All claims are allowable over Proehl for at least the reasons that follow.

Proehl

The Proehl '391 patent discloses a remote control 10 (Figure 1) or 30 (Figure 2) with a scroll wheel 12 (Figure 1) or 38 (Figure 2) and a corresponding on-screen graphical user interface (GUI), which has a fixed horizontal status bar 102, 230, or 250 through which choices in user navigable fields scroll vertically in response to activation of the remote control's scroll wheel. Proehl's system is intended to "allow[] the user to easily navigate AV options that may be presented in a variety of formats, including an electronic program guide (EPG), websites, and AV device menus, on a television screen, monitor, screen or other display apparatus." Col. 3, lines 2-6. For example, Proehl's systems allows a user to scroll through and select from various applications, such as help, shopping, playing CDs, television, video recording, and WWW surfing (Figures 7-8); to scroll through and select from available song choices on a CD (Figures 5-6 and 12-14); to scroll through and select from available television channels (Figures 9-11); etc.

Proehl's system accesses data in a variety of disparate databases, such as local CD track lists, a television programming (EPG) database, and music download databases. Those and other databases are illustrated by reference numbers 42a ... 42m and 49a ... 49i in Proehl's Figure 3 and described at column 7, lines 21-36.

Proehl does not describe how his various applications or routines interface with those databases. Instead, Proehl describes the overall functionality of his system and GUI without disclosing any particular software architecture. Notably, the only passages of Proehl's specification mentioning his databases are column 7, lines 21-36 (cited above) and a passing mention at column 13, lines 56-58.

Claim 1

Claim 1 stands rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Proehl. The Applicants believe that claim 1 is patentable over Proehl for at least the reasons that follow. Claim 1 now reads as follows (with emphasis added):

> 1. An interface for linking one or more entertainment media applications to a plurality of databases, wherein at least two of said plurality of databases contain incompatible data concerning entertainment media content, the interface comprising:
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> a plurality of nodes to retrieve data from one or more of said databases and to provide said data to said one or more applications; and
>
> one or more services to perform predefined actions associated with said nodes,
>
> wherein said nodes are intermediate interface objects logically interposed between said services and said databases, said nodes providing data from said databases to said services in a format that is uniform and generic with respect to said plurality of databases,
>
> wherein at least one of said nodes is associated with several different services and at least one of said services is associated with several different nodes.

Thus, claim 1 refers to "nodes," which are "intermediate interface objects logically interposed between" "a plurality of databases" and "one or more services." Prior to the current amendment, claim 1 simply stated that the nodes "provide said data to one or more applications in a consistent manner." The second Office action explained that the Examiner was interpreting the term "consistent" broadly to mean "reproducible as needed." See second Office action at 3 (¶ 1). Without conceding that the Office's interpretation is correct, the Applicant has deleted that language from the claim and amended the claim to state that "said nodes provid[e] data from said databases to said services in a format that is uniform and generic with respect to said plurality of databases."

Proehl's system does not disclose this limitation expressed in the language added to the claim by amendment. While it is true that Proehl discloses a variety of different databases and different applications, as well a plurality of nodes 44, 48, 52a-52n (remote/local servers/network devices) to retrieve data from the one or more databases and to provide the data to the one or more applications (options/applications), Proehl does not disclose or suggest that those nodes "provid[e] data from said databases to said services in a

format that is uniform and generic with respect to said plurality of databases," as the claim now states. Proehl is silent as to how his applications interface with the various databases in his system. The Proehl patent certainly does not describe the remote server 44, the home server 48, or any of the devices 52a-52n (i.e., Proehl's "nodes") as performing any type of data format conversion from various disparate database formats to a uniform or generic format. One skilled in the art would most likely assume from reading Proehl's patent that his applications take in data from various databases in numerous different formats and process that differently formatted data directly in those various native formats. That is the conventional and most natural way one skilled in the art would interface with a number of diverse databases, in the absence of the present application's teachings. As such, the anticipation rejection of claim 1 based on Proehl is not well-founded and must be withdrawn.

Claims 2-13 depend from claim 1 and should be allowed for at least the fact that they depend from allowable claim 1.

Claim 14

Claim 14 also stands rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Proehl. The Office action grouped claim 14 together with claim 1 for purposes of the Proehl-based rejection. However, claim 14 now reads as follows (with emphasis added):

> 14. A data interface layer within a multimedia system for providing data from a plurality of different entertainment media databases to one or more entertainment media applications, the data interface layer comprising:
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> a first data interface object adapted to retrieve a first set of data from a first one of said entertainment media databases and provide said data to said applications;
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> a second data interface object adapted to retrieve a second set of data from a second one of said entertainment media databases and provide said data to said applications,
>
> wherein said data is provided to said applications from both said first data interface object and said second data interface object in a format that is uniform and generic with respect to said different entertainment media databases.

The Applicants believe that claim 14 is patentable over Proehl for reasons similar to those presented above in regard to claim 1, as Proehl fails to disclose the first and second "data interface object[s]" "wherein said data is provided to said applications from both said first data interface object and said second data interface object in a format that is uniform and

generic with respect to said different multimedia databases." This underlined languages replaces the phrase "in a consistent manner." The Applicants therefore request allowance of claim 14 and its dependent claims 15-22.

Claim 23

Claim 23 also stands rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Proehl. The Office action did not specifically address claims 23 differently from the earlier claims. However, claim 23 now reads as follows (with emphasis added):

> 23. An interactive home entertainment system comprising:
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> a plurality of disparate databases containing data related to multimedia content or other entertainment media content;
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> a plurality of applications to access and process data from said databases; and
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> a node layer comprising a plurality of nodes including a first type of node adapted to retrieve data from a first type of database and a second type of node adapted to retrieve data from a second type of database, wherein both said first type of node and said second type of node provide said data to said applications in a format that is uniform and generic with respect to said plurality of disparate databases.

The Applicants believe that claim 23 is patentable over Proehl for reasons similar to those presented above in regard to claim 1, as Proehl fails to disclose the first and second "type[s] of nodes" "wherein both said first type of node and said second type of node provide said data to said applications in a format that is uniform and generic with respect to said different multimedia databases." This underlined languages replaces the phrase "in a consistent manner." The Applicants therefore request allowance of claim 23 and its dependent claims 24-26.

Conclusion

The Applicants submit that the application is in condition for allowance and respectfully request a Notice of Allowability. If the Examiner has any concerns about the application, or if the undersigned attorney can assist in expediting the allowance of the application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,

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